

Bryan W. Shaw, Ph.D., P.E., *Chairman*
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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 19, 2015

Mr. Gary Miller, Remedial Project Manager
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-RA)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Draft Addendum 3 to the Sediment Sampling and Analysis Plan (SAP) and the
Draft Addendum 1 to the Sampling and Analysis Plan (SAP): TCRA Cap Porewater
Assessment, October 2015
San Jacinto River Waste Pits Federal Superfund Site - Comments
Harris County, Texas

Dear Mr. Miller:

The Texas Commission on Environmental Quality (TCEQ) Remediation Division, Superfund Section has completed reviews of the Draft Addendum 3 to the Sediment Sampling and Analysis Plan (SAP) and the Draft Addendum 1 to the Sampling and Analysis Plan (SAP): TCRA Cap Porewater Assessment prepared by Anchor QEA, LLC (Anchor) dated October 23, 2015, and received on October 27, 2015. We do not have comments on the sediment SAP at this time. Regarding the TCRA Cap Porewater Assessment, the TCEQs comments are provided below.

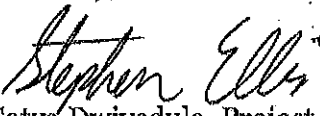
1. Depending on the limitations of the available SPME (solid-phase microextraction) technology, the PRPs should ensure that the proposed approach is capable of detecting porewater concentrations at or below the human health Texas Surface Water Quality Standard (i.e., 7.97×10^{-8} ug/L TCDD Equivalents).
2. The 2012 assessment targeted 2,3,7,8-TCDD and 2,3,7,8-TCDF in porewater. For the winter 2015/2016 monitoring, 2,3,4,7,8-PeCDF will be added to the analytes. The K_{fw} (fiber-water partition coefficients) are different than those used in 2012. Additionally, it is unclear if the fiber unit volumes are the same. Will these differences complicate comparisons with the 2012 porewater results?
3. It is not clear where the porewater samples and surface water samples will be located. Further it is not clear if porewater samplers will be deployed around the perimeter of the cap as requested in U.S. EPA's August 2015 e-mail to Anchor QEA. This should be clarified.

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4. Anchor QEA estimated Kfw values for dioxins based on a regression equation correlating Kfw with octanol-water partition coefficients for PCBs, pesticides, and PAHs. There was a very brief discussion on this derivation (i.e., Attachment 3). Please evaluate the discussion in DiFilippo and Eganhouse, 2010, and determine if the conditions in the selected studies are similar to the expected site temperature and fiber coating thickness of the selected SPME fibers. Please adjust the regression equation if this analysis indicates a need to re-evaluate the studies used in the Kfw and logKow correlation proposed for this study.

If you have any questions, please contact me at (512) 239-3548.

Sincerely,


for Satya Dwivedula, Project Manager
Superfund Section,
Remediation Division
Texas Commission on Environmental Quality

SE/dl

cc: Valmichael Leos, On-Scene Coordinator, U.S. EPA, Region 6, Superfund Division (6SF-RA),
Carlos Sanchez, Branch Chief, U.S. EPA, Region 6, Superfund Division